

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al. ¹	§	CASE NO. 20-33948 (MI)
Debtors	§	
	§	
	§	Jointly Administered

**SAMSON CONTOUR ENERGY E & P, LLC’S RESERVATION OF RIGHTS AND
JOINDER IN CHEVRON U.S.A. INC. AND NOBEL ENERGY, INC’S RESERVATION
OF RIGHTS IN CONNECTION WITH THE DEBTORS’ DISCLOSURE STATEMENT
FOR AMENDED JOINT CHAPTER 11 PLAN OF FIELDWOOD ENERGY LLC AND
ITS AFFILIATED DEBTORS
(RELATING TO DKT NOS. 723, 724, 880, 990, 1022, AND 1061)**

NOW INTO COURT, through undersigned counsel, comes Samson Contour Energy E & P, LLC (“SCEEP”), and respectfully files this reservation of rights and joinder in Chevron U.S.A. Inc.’s and Nobel Energy, Inc.’s Reservation of Rights in connection with the Debtors’ Disclosure Statement for the Amended Joint Plan of Fieldwood Energy and its Affiliated Debtors (the “Chevron Reservation”) for the following reasons:

- SCEEP objected to the adequacy of the Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Fieldwood Energy LLC and Its Affiliated Debtors [DKT. 990]. SCEEP maintains its objections, and, due to the lack of opportunity to fully review the recent filings and for the reasons set forth in the Chevron Reservation,

¹ Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042. These parties are referred to herein collectively as the Debtors.

expressly reserves all of its rights and its objections to any disclosure issues that may exist in connection with these recent filings.

Dated March 19, 2021

Respectfully submitted,

/s/ Jan M. Hayden

Jan M. Hayden (#06672)

Lacey E. Rochester (#34733)

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC**

201 St. Charles Avenue, Suite 3600

New Orleans, Louisiana 70170

Telephone: (504) 566-5200

Facsimile: (504) 636-4000

jhayden@bakerdonelson.com

lrochester@bakerdonelson.com

Attorneys for Samson Contour Energy E & P, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2021, a true and correct copy of the foregoing pleading was served via the Court's Electronic Notification System on all parties entitled to such notice.

/s/ Jan M. Hayden

JAN M. HAYDEN